

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**RAJEEV SHARMA AND VISHNU
SHARMA,**

Debtors.

**WHITE OAK BUSINESS CAPITAL
INC.,**

Plaintiff,

vs.

**RAJEEV SHARMA AND VISHNU
SHARMA,**

Defendants.

Bankruptcy No. 20-22860-GLT

Adv. Proc. No. 21-02042-GLT

Document No.

Related to Doc. Nos. 1 & 6

CONSENT MOTION TO EXTEND TIME TO FILE ANSWER

AND NOW, comes Rajeev Sharma and Vishnu Sharma, the Defendants in the instant Adversary Proceeding, by and through their Counsel, Robert O Lampl, John P. Lacher, Ryan J. Cooney and Sy O. Lampl and file this **CONSENT MOTION TO EXTEND TIME TO FILE ANSWER**, as follows:

1. Plaintiff filed its Amended Complaint on April 15, 2021.
2. On that same day, a Summons was issued against Defendants directing them to provide an Answer to the Amended Complaint within thirty (30) days.
3. The parties have settled the claims set forth in the instant Adversary Proceeding subject to finalizing a written settlement agreement and obtaining this Honorable Court's approval.

4. Accordingly, the Defendants request a forty-five (45) day extension to file to file their Answer so that the settlement agreement can be drafted, and Court approval can be sought.

5. Plaintiff consents to the relief requested by this motion.

WHEREFORE, the Defendants respectfully request that this Court enter an order extending the time for the Defendants to file their Answer to the Amended Complaint by a period of 45 days until July 1, 2021.

Respectfully submitted,

Date: May 19, 2021

/s/ Robert O Lampl
ROBERT O LAMPL
PA I.D. #19809
JOHN P. LACHER
PA I.D. #62297
RYAN J. COONEY
PA I.D. #319213
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CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, Ryan J. Cooney, and Sy O. Lampl hereby certify, that on the 19th day of May, 2021, a true and correct copy of the foregoing Consent Motion to Extend Time to File Answer was served upon the following (*via electronic service and/or email and/or first class mail*):

Office of the U.S. Trustee
1001 Liberty Avenue
Suite 970, Liberty Center
Pittsburgh, PA 15222

George T. Snyder
Stonecipher Law Firm
125 First Avenue
Pittsburgh, PA 15222

Date: May 19, 2021

/s/ Robert O Lampl

ROBERT O LAMPL

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JOHN P. LACHER

PA I.D. #62297

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